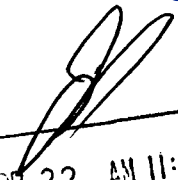


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO. 00-6273-CR-HUCK

FILED BY  D.C.
02 APR 22 AM 11:14
CLARENCE HADDOX
CLERK U.S. DIST. CT.
S.D. OF FL - MIAMI

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ARIEL HERNANDEZ, et al.,

Defendant,

**MOTION FOR LEAVE TO FILE OBJECTIONS
TO PRE-SENTENCE INVESTIGATION REPORT OUT OF TIME**

THE DEFENDANT, ARIEL HERNANDEZ, by and through the undersigned counsel, respectfully moves this Honorable Court for entry of an Order permitting him to file his objections to the pre-sentence investigation report out of time, and in support thereof would state:

1. The pre-sentence investigation report was received in the offices of the undersigned counsel by fax on or about March 21, 2002.
2. Several weeks prior to receipt of the pre-sentence investigation, the undersigned's father, Dr. W. Stanley Weinkle, was admitted to Mt. Sinai Hospital as a result of his cancer. On March 25, 2002 Dr. Weinkle passed away.
3. As a result of the attention given to these personal matters, the undersigned had not had the opportunity to confer with the defendant as quickly as he normally would have and had not had the opportunity to prepare the appropriate objections.
4. Along with this Motion, the undersigned is filing Defendant, Ariel Hernandez's Objections to Pre-sentence Investigation Report.


5/8/02

United States v. Ariel Hernandez
CASE NO. 00-6273-CR-HUCK

5. The undersigned has conferred with AUSA Lawrence LaVecchio who has indicated that the government has no objection to permitting the defendant to file his objections out of time.

WHEREFORE, the Defendant respectfully moves this Honorable Court to enter its Order permitting him to file his Objections to Pre-sentence Investigation Report out of time.

Respectfully submitted,


JEFFREY D. WEINKLE, ESQ.
FBN: 271934

United States v. Ariel Hernandez
CASE NO. 00-6273-CR-HUCK

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was mailed/delivered this
__19__ day of __April__, 2002, to: UNITED STATES ATTORNEY'S OFFICE, **AUSA**
Lawrence LaVecchio, 500 E. Broward Blvd., Suite 700, Ft. Lauderdale, FL 33394 (Fax: 954-356-
7230); and to **Thomas Felasco**, U.S. Probation Officer, 300 N.E. 1st Avenue, Room 315, Miami,
FL 33132-2126, (Fax: 305-523-5496).

Stephen Rosen, Esq.
Suite 1020
1221 Brickell Avenue
Miami, FL 33131
(Attorney for Trentacosta)

HADDAD & HESTER, P.A.
Fred Haddad
One Financial Plaza, Suite 2612
Ft. Lauderdale, FL 33394
(Attorney for Massaro)

JEFFREY D. WEINKLE, ESQ.
1035 NW 11th Avenue
Miami, FL 33136-2911
Tel: 305-373-4445
Fax: 305-545-8514


JEFFREY D. WEINKLE